

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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JOHN K. LUCE, II,

Docket No. 1:21-cv-00718-GTS-DJS

Plaintiff,

- against -

YRC INC., YRC INC. d/b/a YELLOW FREIGHT;
YRC WORLDWIDE ENTERPRISE SERVICES, INC.,
YRC FREIGHT; YRC WORLDWIDE, INC.; and
YELLOW FREIGHT SYSTEM INC.,

Defendants.
-----X

SUPPLEMENTAL NOTICE OF REMOVAL

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that the defendants, hereby supplement paragraph 4 to their Notice of Removal pursuant to 28 U.S.C. §§ 1332, 1441, and 1446 as follows:

4. Upon information and belief, the plaintiff will demand judgment against the defendants in an amount that exceeds \$75,000 exclusive of interest and costs, since he communicated a settlement demand of \$200,000 through his counsel on June 24, 2019 to Richard Vannaman of Sedgwick, CMS, Inc.; and plaintiff claims to have sustained, among other injuries, a radial fracture of his left elbow requiring surgical correction, and a concussion.

Dated: August 9, 2021

Respectfully submitted,

RYAN SMITH & CARBINE, P.C.

By: /s/ Mark F. Werle

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Worldwide, Inc., i/s/h/a Yellow Freight
System Inc., and improperly stated to be
d/b/a “Yellow Freight; and YRC
WORLDWIDE ENTERPRISE SERVICES, INC.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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JOHN K. LUCE, II,

Docket No.: 1:21-cv-00718-GTS-DJS

Plaintiff,

- against -

CERTIFICATE OF SERVICE

YRC INC., YRC INC. d/b/a YELLOW FREIGHT;
YRC WORLDWIDE ENTERPRISE SERVICES, INC.,
YRC FREIGHT; YRC WORLDWIDE, INC.; and
YELLOW FREIGHT SYSTEM INC.,

Defendants.
-----X

I hereby certify that on August 9, 2021, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to the following:

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Dated: August 9, 2021

/s/ Mark F. Werle

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